

## MEMORANDUM ENDORSED

LAW OFFICES OF  
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MEMBER: N.Y. & N.J. BAR

March 25, 2024

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearly Stret  
New York, NY 10007

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: _____ DATE FILED: <u>3/26/2024</u>
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Re: United States v Rubinsky Padilla  
24 Cr 107 (GHW)

Dear Judge Woods:

I am appointed pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A to represent Mr. Padilla in the above referenced matter. In contemplation of a potential agreed upon bail package in the above referenced matter I write to respectfully request that the Court order Pretrial Services to inspect the home of Mr. Padilla fiancé's home, Patricia Crispo, at an address to be provided to Pretrial Services by defense counsel. The Government consents to this request.

Mr. Padilla was arrested on February 23, 2024 and appeared before the Magistrate Court for initial appearance. At that appearance, Mr. Padilla consented to bond without prejudice to come before the Court to seek bond. On March 4, 2024 Mr. Padilla appeared before this Court and entered a plea of not guilty to the Indictment. The next court appearance in this matter is June 3, 2024.

I have informed the Government of Mr. Padilla potential bond package. The Government has agreed to consider the proposed bond package after Pretrial Services' inspection of Ms. Crispo's home. I understand that Pretrial Service requires a Court order to conduct a home inspection.

Accordingly, Mr. Padilla respectfully requests that the Court order Pretrial Services to inspect the home of Mr. Padilla fiancé, Patricia Crispo's, at an address to be provide to Pretrial Services by defense counsel.

Respectfully submitted,  
/s/

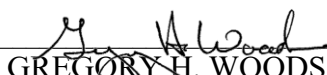
Donna R. Newman  
Cc: AUSA Ashley Nicolas  
AUSA Lisa Daniels

Application granted. Pretrial Services is directed to inspect Mr. Padilla's proposed residence.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 19.

SO ORDERED.

Dated: March 26, 2024  
New York, New York

  
GREGORY H. WOODS  
United States District Judge